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FILED  
U.S. DISTRICT COURT

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DISTRICT OF UTAH

BY: \_\_\_\_\_  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

PLAINTIFF,

v.

JERSEY CONSULTING LLC, a Nevada  
limited liability company, MARC ANDREW  
TAGER, an individual, SUZANNE AILEEN  
GAGNIER, an individual, KENNETH  
STEPHEN GROSS, an individual, JEFFREY  
ROWLAND LEBARTON, an individual,  
JONATHAN EDWARD SHOUCAIR, an  
individual, and JASON VITOLO, an individual,

DEFENDANTS; and

PREMIER MARKETING SOLUTIONS, INC.,  
a California corporation, EQUITY FIRST  
PROPERTIES INC., a California corporation,  
MATTHEW JACOB FREITAS, an individual,  
ROXANE MARIE GROSS, an individual,  
MATTHEW EARL MANGUM, an individual,  
and CHRISTINE L. SHOUCAIR, an individual,

RELIEF DEFENDANTS.

**PLAINTIFF'S MOTION TO STRIKE  
PRELIMINARY INJUNCTION  
HEARING SET FOR MARCH 5, 2018**

Case No.: 2:18-cv-00155

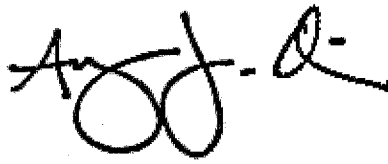
Judge: Bruce S. Jenkins

Plaintiff Securities and Exchange Commission (the "Commission") hereby files this motion to strike the hearing currently set for March 5, 2018 at 3:00 p.m. On March 1, 2018, the Commission filed signed stipulations to the entry of the preliminary injunction from each named Defendant. Because each of the Defendants has stipulated to the entry of the preliminary injunction, the hearing set for March 5, 2018 at 3:00 p.m. has been rendered moot.

Therefore, the Commission respectfully requests that the preliminary injunction hearing set for March 5, 2018 be stricken. A proposed Order is attached hereto as Exhibit A.

Dated March 1, 2018.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Amy J. Oliver", with a stylized flourish at the end.


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Amy J. Oliver  
Daniel Wadley  
Attorneys for Plaintiff  
Securities and Exchange Commission

## CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March, 2018, I served true and correct copy of the foregoing **PLAINTIFF'S MOTION TO STRIKE PRELIMINARY HEARING SET FOR MARCH 5, 2018** via email upon the following:

<p>Marc A. Tager Weber County Jail 721 W. 12<sup>th</sup> Street Ogden, UT 84404 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Defendant</i></p>	<p>Brent R. Baker Clyde Snow &amp; Sessions, PC 201 S. Main Street, Suite 1300 Salt Lake City, UT 84111 <a href="mailto:brb@clydesnow.com">brb@clydesnow.com</a></p> <p><i>Counsel to Defendant Suzanne A. Gagnier</i></p>
<p>Nathan A. Crane Snow, Christensen &amp; Martineau 10 Exchange Place, 11<sup>th</sup> Floor P.O. Box 45000 Salt Lake City, UT 84145 <a href="mailto:nac@scmlaw.com">nac@scmlaw.com</a></p> <p><i>Counsel to Defendant Kenneth S. Gross</i></p>	<p>Scott Vick Vick Law Group APC 800 W 6<sup>th</sup> Street, Suite 1220 Los Angeles, CA 90017 <a href="mailto:scott@vicklawgroup.com">scott@vicklawgroup.com</a></p> <p><i>Counsel to Defendant Jeffrey R. Lebarton</i></p>
<p>James C. Bradshaw Brown, Bradshaw &amp; Moffat 422 North 300 West Salt Lake City, UT 84103 <a href="mailto:jim@brownbradshaw.com">jim@brownbradshaw.com</a></p> <p><i>Counsel to Defendant Jonathan E. Shoucair</i></p>	<p>Michael K. Hepworth 140 S. Main Bountiful, UT 84010 <a href="mailto:michael@hepworthlegal.com">michael@hepworthlegal.com</a></p> <p><i>Counsel to Defendant Jason Vitolo</i></p>
<p>R. Blake Hamilton Ashley M. Gregson <b>DURHAM JONES &amp; PINEGAR, P.C.</b> <a href="mailto:bhamilton@djplaw.com">bhamilton@djplaw.com</a> <a href="mailto:agregson@djplaw.com">agregson@djplaw.com</a></p> <p><i>Counsel to Relief Defendant Matthew E. Mangum</i></p>	



Amy J. Oliver

# Exhibit A

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U.S. DISTRICT COURT

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MATTHEW EARL MANGUM, an individual,  
and CHRISTINE L. SHOUCAIR, an individual,

RELIEF DEFENDANTS.

**PROPOSED ORDER STRIKING  
PRELIMINARY INJUNCTION  
HEARING SET FOR MARCH 5, 2018**

Case No.: 2:18-cv-00155

Judge: Bruce S. Jenkins

Plaintiff Securities and Exchange Commission (the "Commission") submitted a Motion to Strike the Preliminary Injunction Hearing Set for March 5, 2018 based on the fact that all defendants had stipulated to entry of the preliminary injunction order. Therefore, for good cause shown, IT IS HEREBY ORDERED that the hearing on March 5, 2018 at 3:00 p.m. is stricken from the docket.

DATED this \_\_\_\_\_ day of March, 2018.

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Bruce S. Jenkins  
Senior United States District Judge